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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MONICA CONTRERAS, individually,
and in her capacity as natural mother and
guardian of, and on behalf of, ANDREA
PATERNA, a minor,

Plaintiffs,

VS.

RONALD D. FOX; JAMES KENYON;
GREGORY BRYANT; PATRICIA
DONINGER; CLARK COUNTY,
NEVADA; DOES 1-10; and ROE
ENTITIES 11-20, inclusive,

Defendants.

CASE NO. 2:13-cv-00591-JCM-PAL

JOINT MOTION TO STAY PROCEEDINGS

COMES NOW the parties, by and through their respective undersigned counsel of record, and hereby move this Honorable Court for an Order staying all proceedings in this matter as a result of a tentative settlement agreement which was reached by the parties during an April 24, 2014 mediation.

Unfortunately, the parties' settlement cannot be finalized until approximately July 8, 2014, when the settlement is brought before the State of Nevada Board of Examiners for formal approval. The parties, in good faith, believe that their settlement will be approved at their meeting and a Stipulation and Order for Dismissal with Prejudice will be filed with the Court not later than fourteen (14) days thereafter.

1 In the interim period, the parties will prepare and execute a Settlement Agreement and
2 Release of All Claims and Plaintiffs' counsel will secure an Order from a court of competent
3 jurisdiction to compromise the claims of minor Plaintiff, Andrea Paterna, for the sums set forth
4 in the parties' Settlement Agreement.

5 Based upon and in view of all of the foregoing, the parties hereto would respectfully
6 request that this Honorable Court enter an Order staying all proceedings in this case to allow
7 them sufficient time to finalize the settlement that they have reached. The parties anticipate
8 having a Stipulation and Order for Dismissal with Prejudice filed with this Court not later than
9 fourteen (14) days after receiving approval from the State of Nevada Board of Examiners on July
10 8, 2014.

11 Respectfully submitted this 28th day of April, 2014.

12 GOODMAN LAW GROUP, P.C.

13 /s/ Ross C. Goodman
14 ROSS C. GOODMAN, ESQ.
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18 /s/ Tracy A. Eglet
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36 Attorney for Defendants James Kenyon
37 and Gregory Bryant

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3 /s/ Robert W. Freeman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of April, 2014, I served the above JOINT
MOTION TO STAY DISCOVERY through the CM/ECF system of the United States District
Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid),
upon the following:

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/s/ Nanette D. Langenderfer
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